

## UNITED STATES DISTRICT COURT

for the

Central District of California ☐

TODD R. G. HILL, pro se,

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Plaintiff(s)

v.

SEE ATTACHED

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Defendant(s)

Civil Action No. 2:23-cv-01298-JLS-BFM

THIRD AMENDED COMPLAINT

## SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

PREM SARIN, DAVID TYLER BOUFFARD, HECTOR SANCHEZ, GARY SILBIGER,  
EDITH POMOSO, ADRIANA ZUNIGA NUNEZ and DAVID LAWRENCE

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

TODD R. G. HILL  
41459 ALMOND AVENUE  
QUARTZ HILL, CA 93551  
Email: toddryangregoryhill@gmail.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 08/27/2024



/s/ - Christianna Howard

Signature of Clerk or Deputy Clerk

Civil Action No. 2:23-cv-01298-JLS-BFM

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

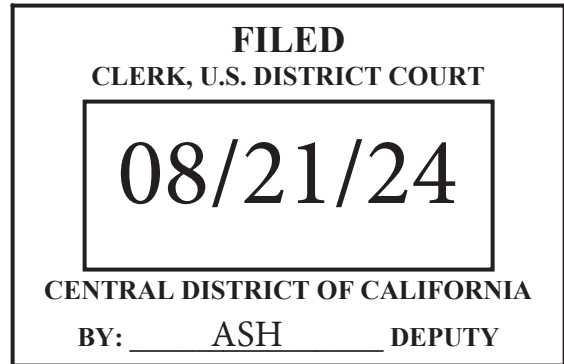
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

TODD R. G. HILL  
41459 Almond Avenue  
Quartz Hill, CA 93551  
+1 (661) 899-8899  
Email: [toddryangregoryhill@gmail.com](mailto:toddryangregoryhill@gmail.com)  
IN PRO PER



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA,  
WESTERN DIVISION**

TODD R. G. HILL, pro se,	)	Case No.: 2:23-CV-01298-JLS-BFM
	)	The Hon. Josephine L. Staton
	)	Courtroom 8A, 8th Floor
Plaintiff(s),	)	Magistrate Judge Brianna Fuller Mircheff
	)	Courtroom 780, 7th Floor
vs.	)	<b>DEMAND FOR JURY TRIAL</b>
THE BOARD OF DIRECTORS, OFFICERS	)	<b>Unlimited Civil Case</b>
AND AGENTS AND INDIVIDUALS OF THE	)	<b>THIRD AMENDED COMPLAINT FOR</b>
PEOPLES COLLEGE OF LAW; THE GUILD	)	<b>DAMAGES, DECLARATORY &amp;</b>
LAW SCHOOL, a CALIFORNIA	)	<b>INJUNCTIVE RELIEF ARISING FROM:</b>
CORPORATION doing business as THE	)	I. EQUAL PROTECTION VIOLATION
PEOPLES COLLEGE OF LAW; CHRISTINA	)	UNDER THE 14TH AMENDMENT
MARIN GONZALEZ, ESQ.; HECTOR C.	)	II. VIOLATION OF THE UNRUH CIVIL
PENA; ROBERT IRA SPIRO, ESQ.; JUAN	)	RIGHTS ACT (CALIFORNIA CIVIL CODE
MANUEL SARINANA, ESQ.; PREM SARIN;	)	§ 51)
DAVID TYLER BOUFFARD; JOSHUA	)	III. TITLE VI OF THE CIVIL RIGHTS ACT
	)	OF 1964 - RACIAL DISCRIMINATION IN
	)	EDUCATION
	)	IV. RICO - DAMAGES UNDER
	)	RACKETEER INFLUENCED AND
	)	CORRUPT ORGANIZATIONS ACT

GILLENS, ESQ.; CLEMENTE FRANCO, ) V. CONSPIRACY  
ESQ.; HECTOR SANCHEZ; PASCUAL ) VI. NEGLIGENCE AND NEGLIGENCE  
TORRES, ESQ.; CAROL DEUPREE; GARY ) PER SE  
SILBIGER, ESQ.; EDITH POMPOSO; ) VII. NEGLIGENT HIRING, RETENTION,  
ADRIANA ZUNIGA NUNEZ; ROGER ) AND SUPERVISION  
ARAMAYO; WILLIAM MAESTAS, ESQ.; ) VIII. VIOLATION OF TITLE IX OF THE  
ISMAEL VENEGAS; LOUISA ) EDUCATION AMENDMENTS OF 1972  
AYRAPETYAN; NATALIE LEONARD; ) (20 U.S.C. § 1681)  
LEAH WILSON, ESQ.; BRANDON N. )  
STALLINGS, ESQ.; RUBEN DURAN, ESQ.; )  
HAILYN CHEN, ESQ.; AUDREY CHING, )  
ESQ.; MELANIE M. SHELBY; ARNOLD )  
SOWELL, JR.; MARK W. TONEY, PH.D.; )  
PAUL A. KRAMER, ESQ.; JEAN )  
KRASILNIKOFF, ESQ.; ELLIN DAVTYAN; )  
GEORGE S. CARDONA, ESQ.; DEVAN )  
MCFARLAND; ENRIQUE ZUNIGA, ESQ., )

Defendant(s).

**I.  
PARTIES**

1. PLAINTIFF. Plaintiff Todd R.G. Hill (“Plaintiff” or “Todd”) is an African American adult residing in Quartz Hill, California, with an ADA-recognized disability.

2. DEFENDANTS: